

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider whether certain materials should be sealed. Pursuant to the Court's Order dated January 30, 2025 (ECF No. 2184), Plaintiffs file the documents referenced in footnotes 5 and 6 of the parties' Joint Letter Regarding TAR Validation (ECF No. 2166) under seal as they have been marked by Uber as highly confidential.

Material To Be Filed Under Seal

Document	Description	Designating Party
UBER_JCCP_MDL_000032097	Document designated confidential	Uber
UBER_JCCP_MDL_000192322	Document designated confidential	Uber
UBER_JCCP_MDL_000040852	Document designated confidential	Uber

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	UBER-MDL3084-000099693	Document designated confidential	Uber
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Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court’s order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: February 3, 2025

Respectfully submitted,

By: /s/ Roopal P. Luhana

Roopal P. Luhana

CHAFFIN LUHANA LLP
600 Third Avenue, 12th Floor
New York, NY 10016
Telephone: (888) 480-1123
Facsimile: (888) 499-1123
luhana@chaffinluhana.com

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
slondon@lchb.com

By: /s/ Rachel B. Abrams

Rachel B. Abrams (SBN 209316)

**PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP**

555 Montgomery Street, Suite 820

San Francisco, CA 94111

Telephone: (415) 426-5641

Facsimile: (415) 840-9435

rabrams@peifferwolf.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 3, 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to registered parties.

/s/Roopal Luhana